



April 25, 2006

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Standardization Section  
Fresh Products Branch  
Fruit & Vegetable Programs  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Room 1661 South Building, Stop 0240  
Washington, D.C. 20250-0240

To Whom It May Concern:

**Re: United States Standards for Grades of Bunched Italian Sprouting Broccoli  
Docket #FV-05-303**

Western Growers is an agricultural trade association whose nearly 3,000 members grow, pack and ship 90% of the fresh vegetables and nearly 70% of the fresh fruits and nuts grown in Arizona and California, which amount for over one half of the nation's produce production.

It is on behalf of these members that I am submitting these comments after compiling a survey with Western Growers broccoli growers, shippers and packers.

Western Growers' concurs with AMS's conclusion that broccoli crowns and florets should be included in the United States Standards for Grades of Italian Sprouting Broccoli.

In addition, it is our members' concern that broccoli crowns should have a maximum stem length and that bunched broccoli should contain more than one stock.

Therefore at this time it is on behalf of Western Growers that I respectfully submit these comments supporting the proposal in amending the U.S. Grade Standards for Italian Sprouting Broccoli.

Very truly yours,

THOMAS R. OLIVERI

Director, Trade Practices & Commodity Services